

December 18, 2006

Federal Election Commission
999 E Street, NW.
Washington, D.C. 20463

Id Number: C00397737

Reference: October Quarterly Report (8-31-06/9-30-06)

To Whom It May Concern:

We are in receipt of the Commission's letter regarding the above referenced report. Please see below for our complete response.

We realize the importance of accurately reporting all "last minute" contributions. We do utilize a system to ensure that we do just that. The fact that we have several different sources of funding makes this task more complicated than most. I believe this fact played a role in the "Robert Nelson" contribution. We received an electronic receipt for his credit card contribution and filed the 48 hour notice. But, when we received a monthly summary of activity, his name had been changed to Robert Hansen. We made the change in our database at that time not realizing that it would cause our quarterly report to not match the last minute filing. The fact is that Robert Hansen actually made the contribution and is reported correctly on the October Quarterly report.

With respect to the Leuthold and Simperman contributions, we simply erred in not reporting them as last minute contributions. With both of these contributions, we requested a redesignation of a portion of the contribution. This additional step in our processing requires that the check copy be pulled away from the rest of the deposit. We strongly suspect that is the reason that they were not reported with the other last minute contributions for the day. We have reviewed our overall system to ensure that this problem has been addressed. While we did successfully report a large number of last minute contributions we realize that 100% accuracy is the standard and we will continue to adjust our procedures to attain that.

Please contact us if any further information is needed.

Thank you,

Friends of Dave Reichert
